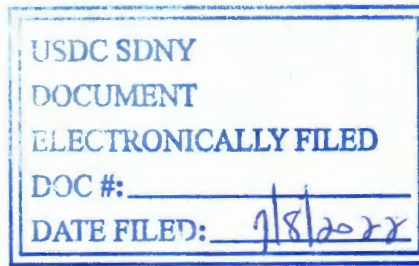


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July 7, 2022

VIA ECF

The Honorable Colleen McMahon
United States Courthouse
500 Pearl Street
New York, NY 10007 - 1312

Re: **Joint Letter Motion to Extend Deadlines**
Vallair Solutions SARL v. 321 Precision Conversions, LLC
No. 1:21-cv-07507-CM

MEMO ENDORSED

Dear Judge McMahon:

Pursuant to Rule I(D) of this Court's Individual Practices and Procedures, Plaintiff Vallair Solutions SARL ("Vallair" or "Plaintiff") and Defendant 321 Precision Conversions, LLC ("Precision" or "Defendant") (collectively referred to as "the Parties"), jointly move this Court for a 90-day extension of all existing case deadlines.

As you may recall, Lisa J. Savitt of The Axelrod Firm was substituted as counsel for Vallair in this matter on December 21, 2021. After taking over as Vallair's counsel in this matter, Ms. Savitt was required to review numerous documents and speak with Vallair's representatives to investigate and become familiar with the matter. In addition, Seth Linnick, former counsel of record for Precision, left Tucker Ellis and Chelsea Mikula of Tucker Ellis took over the case. Ms. Mikula moved for *pro hac vice* admission on March 25, 2022 and the motion was granted on April 4, 2022. Vallair filed an Amended Complaint on March 17, 2022. In light of the filing of the First Amended Complaint, and because counsel for both Parties were new to the case, on March 17, 2022, the Parties jointly requested an extension of time until April 5, 2022 for Precision to answer the First Amended Complaint and for the Parties to exchange Initial Disclosures pursuant to Fed. R. Civ. P. 26(a), and a 90-day extension of all remaining case deadlines. The Court granted the Parties' joint request to extend the deadlines on March 17, 2022 [Doc. 24], which was the only request by the Parties' current counsel to extend the deadlines.

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Precision has subsequently answered the Amended Complaint and filed a Counterclaim against Vallair, which Vallair has answered, and the Parties have exchanged Initial Disclosures pursuant to Fed. R. Civ. P. 26(a). At the joint request of the Parties, this matter has been referred to Magistrate Judge Lehrburger for a judicial settlement conference [Doc. 40]. The settlement conference was initially scheduled for July 5, 2022, but at the request of Judge Lehrburger, was pushed back to July 21, 2022.

The Parties have exchanged discovery requests and are working on responses. The Parties are working on an ESI protocol as it is expected that this will be needed to search for the documents responsive to the discovery requests. We expect there will be follow up about the responses, and that the Parties will want to schedule depositions. While the Parties hope that the settlement conference before Judge Lehrburger is successful, the current deadlines are unrealistic should the settlement conference not succeed, including the dates for expert reports. Therefore, the Parties jointly respectfully request a 90-day extension of all case deadlines, except those to amend the pleadings and join additional parties.

The requested extensions would result in the following revised deadlines to the Amended Civil Case Management Plan [Doc. 24]:

Event	Original Deadline	Proposed Deadline	Prior Extensions
Discovery Completion	October 14, 2022	January 12, 2023	90-day extension granted on 12/21/21 [Doc. 20]; 90-day extension granted on 3/17/22 [Doc. 24]
Plaintiff's Expert Report	August 15, 2022	November 14, 2022	90-day extension granted on 12/21/21 [Doc. 20]; 90-day extension granted on 3/17/22 [Doc. 24]
Defendant's Expert Report	September 15, 2022	December 14, 2022	90-day extension granted on 12/21/21 [Doc. 20]; 90-day extension granted on 3/17/22 [Doc. 24]
Joint Pretrial Order	November 28, 2022	February 27, 2023	90-day extension granted on 12/21/21 [Doc. 20]; 90-day extension granted on 3/17/22 [Doc. 24]

A copy of the proposed Amended Civil Case Management Plan is attached hereto.

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Thank you for your consideration of this Joint Motion. The Parties are working diligently to move this case along should it not resolve in the near future.

Respectfully Submitted,

s/ Lisa J. Savitt

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